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IN THE UNITED STATES DISTRICT COURT  
STATE OF UTAH, CENTRAL DIVISION

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MELISSA KENNEDY; FREDERICK  
WILLARD; and THE ESTATE OF  
DANIELLE MISHA WILLARD,

Plaintiff,

vs.

WEST VALLEY CITY; SHAUN COWLEY;  
KEVIN SALMON; JOHN COYLE; THAYLE  
“BUZZ” NIELSEN; and DOES 1-10,

Defendants.

**WEST VALLEY CITY’S AND CHIEF  
NIELSEN’S SECOND SET OF  
INTERROGATORIES TO PLAINTIFFS**

Civil No. 2:13-cv-00434

Judge David Nuffer

Magistrate Judge Evelyn J. Furse

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants West Valley City and Thayle Nielsen submit the following interrogatories to Plaintiffs to be answered, under oath, within thirty (30) days after service hereof. These interrogatories are intended to be continuing so as to require a supplementation of response to the full extent required by Rule 26(e) of the Federal Rules of Civil Procedure.

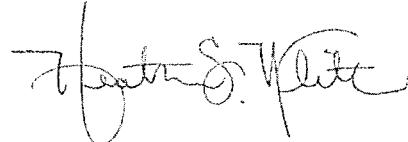
**INTERROGATORY NO. 23:** Please provide the name, address and telephone number of each witness Plaintiffs expect to call at trial, including for impeachment, and identify the subject matter about which the witness is expected to testify.

**INTERROGATORY NO. 24:** Please provide the name, address and telephone number of each witness Plaintiffs may call at trial, including for impeachment, and identify the subject matter about which the witness may testify.

These interrogatories are continuing and Plaintiff is under a duty to supplement them as required by Rule 26(e) of the Federal Rules of Civil Procedure.

DATED this 1<sup>st</sup> day of July, 2014.

SNOW, CHRISTENSEN & MARTINEAU



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Heather S. White  
R. Scott Young  
Nathan A. Crane  
Attorneys for Defendants West Valley City  
and Thayle Nielsen

### CERTIFICATE OF SERVICE

I hereby certify that on the 1<sup>st</sup> day of July, 2014, I caused a true and correct copy of the foregoing **WEST VALLEY CITY'S AND CHIEF NEILSEN'S SECOND ST OF INTERROGATORIES TO PLAINTIFFS** to be served, *via U.S. Mail, postage prepaid and electronic mail*, on the following:

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